

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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Chapter 11

In re :  
DELPHI CORPORATION, et al. : Case No. 05-44481 (RDD)  
Debtor : Jointly Administered

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OBJECTION OF CREDITOR F&G TOOL & DIE CO. INC. TO CURE AMOUNT WITH  
RESPECT TO EXECUTORY CONTRACTS TO BE ASSUMED AND ASSIGNED TO  
PARNASSUS HOLDINGS II, LLC UNDER MODIFIED PLAN OF  
REORGANIZATION (DOC. 18076)

Now comes Creditor F&G Tool & Die Co. Inc. ("F&G Tool") and hereby objects to the cure amounts totaling \$65,043.87, all of which are listed as being currently disputed, listed in the Notice of Assumption and Assignment With Respect to Certain Executory Contracts or Unexpired Leases to be Assumed and Assigned to Parnassus Holdings II, LLC Under Modified Plan of Reorganization, dated July 10, 2009 (Doc. 18076), to the extent that such cure amount does not represent the total amount need to cure all executory contracts involving such creditor. In addition, F&G Tool states the following:

1. Debtors' Notice of Cure relating to creditor F&G Tool. lists in Schedule 1 (Supplier Contracts) attached thereto the following Contracts and Cure Amounts:

<u>Contract</u>	<u>Cure Amount</u>
D0550080025	\$0.00 (listed as disputed)
D0550055872	\$0.00 (listed as disputed)
D0550041831	\$65,043.87 (listed as disputed)

2. As stated in a prior objection to the same proposed cure amounts, the actual cure amount for the applicable executory contracts is \$145,739.73.

3. Debtors have made a settlement offer with respect to the Contract No. D0550041831 which F&G Tool has accepted. Such settlement should resolve the dispute with respect to the cure amount for this particular contract.

Accordingly, creditor F&G Tool & Die Co., Inc. objects to the cure amounts for the reasons set forth above.

Respectfully submitted,

/s/Paul H. Spaeth

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CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that a true and accurate copy of the foregoing Objection of Creditor F&G Tool & Die Co., Inc. To Cure Amount With Respect to Executory Contracts To Be Assumed and Assigned was served electronically through the Court's electronic transmission facilities upon those parties receiving such service in this case and by ordinary United States mail service this 17<sup>th</sup> day of July, 2009 upon the following:

Honorable Robert D. Drain  
United States Bankruptcy Judge  
United States Bankruptcy Court  
for the Southern District of New York  
One Bowling Green, Room 632  
New York, New York 10004

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/s/Paul H. Spaeth  
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